

Exhibit A



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October 2, 2024

VIA ELECTRONIC & FIRST CLASS MAIL

Peter Prusinowski
Empire Holdings Group, LLC
Star Active Sports, LLC
Empire Partner Network, LLC
c/o Gordon Rees Scully Mansukhani
Ryan M. Poteet, Esq. (rpoteet@grsm.com)
Stephen Freeland, Esq. (sfreeland@grsm.com)
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and

Star Active Sports, LLC
c/o United States Corporation Agents, Inc.
1729 West Tilghman Street Rear
Allentown, PA 18109

and

Empire Partner Network LLC
12 Finley Court
Lansdale, PA 19446

**Re: *FTC v. Empire Holdings Group, LLC, et al.*, No. 2:24-cv-04949-WB
Addition of Star Active Sports, LLC and Empire Partner Network, LLC as
Receivership Entities**

Dear Counsel/To Whom It May Concern:

Pursuant to Section XII, Paragraph U of the Temporary Restraining Order with Asset Freeze and Appointment of Temporary Receiver ("TRO Order"), a copy of which is enclosed, please be advised that the Receiver hereby identifies Star Active Sports, LLC ("Star Active Sports") and Empire Partner Network, LLC ("Empire Partner") as Receivership Entities.

Receivership Entities are defined in the TRO Order to include the "Corporate Defendant as well as any other entity that has conducted any business related to the advertising, marketing, and sale of Defendants' Product and Services, including receipt of Assets derived from any activity that is the subject of the Complaint in this matter, and that the Receiver determines is controlled or owned by any Defendant." TRO Order, Definitions (J). Based upon information that Defendants have provided to the Receiver in this matter, the Receiver understands that Defendant, Peter Prusinowski, owns and/or controls Star Active Sports and Empire Partner. Moreover, initial investigation has revealed that Star Active Sports received significant funds from Empire Holdings Group, LLC in connection with its business operations—Star Active Sports received approximately \$3,001,605 across 278 transactions between 2020

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and 2024, substantially all of which were recorded as "Contractor Commissions" in Empire Holdings Group, LLC's general ledger, and thus falls within the definition of "Receivership Entities." As for Empire Partner, the entity is identified as a source of revenue for Empire Holdings Group, LLC within its general ledger, with entries totaling \$99,604, \$77,070 for the years ended December 31, 2022 and 2023, and \$60,200 for the eight months ended August 31, 2024; therefore, Empire Partner has been determined to be an entity that has conducted business related to Empire Holdings' Products and Services and falls within the definition of "Receivership Entities." Accordingly, the Receiver intends to treat both Star Active Sports and Empire Partner Network as Receivership Entities.

If you wish to challenge the Receiver's determination in this regard, you can file a motion with the Court.

Sincerely,

CLARK HILL



Robin S. Weiss

RSW:

cc: Kevin Dooley Kent, Esq., Receiver
Vanessa L. Huber, Esq.
Amanda Grier, Esq.
Ryan McAuliffe, Esq.